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12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 NATIONAL SPECIALTY PHARMACY,)
16 LLC) Case Number: 23-cv-04357-NW
17)
18 Plaintiff,)
19 vs.)
20)
21 SAMEER PADHYE, an individual,)
22 BENJAMIN D. BROWN, an)
23 individual, and DOES 1 to 49,)
24 inclusive,)
25 Defendants.)
26)
27)
28)

19 Pursuant to Federal Rules of Civil Procedure, Rule 41(a)(1)(A)(ii), Plaintiff National
20 Specialty Pharmacy, LLC; Defendant Sameer Padhye; and Defendant Benjamin D. Brown
21 respectfully submit this Stipulation and Proposed Order to dismiss Defendant Benjamin D. Brown
22 from this Action without prejudice.

23 WHEREAS, Plaintiff National Specialty Pharmacy, LLC and Defendant Benjamin D.
24 Brown have agreed to a settlement of their dispute, including Mr. Brown's dismissal from this
25 Action without prejudice;

26 WHEREAS, Defendant Sameer Padhye consents and stipulates to the dismissal of Mr.
27 Brown from this Action;

28 NOW THEREFORE, in consideration of the foregoing, the parties hereby STIPULATE
and AGREE as follows:

That Defendant Benjamin D. Brown be dismissed from this Action without prejudice, with Defendant Brown and Plaintiff National Specialty Pharmacy LLC to bear their own costs and fees.

IT IS SO AGREED AND STIPULATED.

Dated: February 25, 2025

DHILLON LAW GROUP INC.

/s/ Nitoj P. Singh

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Dated: February 25, 2025

THE LAW OFFICE OF RICHARD H. POULSON

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Dated: February 25, 2025

BENJAMIN D. BROWN

/s/ *Benjamin Daniel Brown*

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